

EXHIBIT 62

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, Individually and on behalf of all CASE NO.: 1:22-cv-10019 (JSR)
others similarly situated,

Plaintiff,

vs.

JPMorgan Chase Bank, N.A.,

Defendant.

/

**JPMORGAN CHASE BANK, N.A.’S RESPONSES AND OBJECTIONS TO
PLAINTIFF’S FIRST REQUEST FOR ADMISSIONS**

Defendant JPMorgan Chase Bank, N.A. (“JPMC”) hereby serves its Responses and Objections to Plaintiff’s First Request for Admissions (the “Requests”) pursuant to Federal Rules of Civil Procedure 26 and 36. JPMC denies all Requests, except with respect to anything expressly admitted herein.

PRELIMINARY STATEMENT

These objections and responses are made solely for the purposes of the above-captioned case. Each of JPMC’s objections and responses to the Requests is based on information and documents presently available to JPMC after reasonable inquiry. With respect to Request Nos. 9-31, JPMC’s responses are also based on Mr. Dimon’s current recollection of events. Discovery is ongoing, and JPMC specifically reserves the right to amend or supplement its objections and responses as necessary, including in the event further information and documents are discovered or produced by JPMC after discovery has been completed. In addition, JPMC’s objections and responses are given without prejudice to its rights to introduce at trial evidence of any subsequently discovered or unintentionally omitted facts or documents.

REQUEST FOR ADMISSION NO. 6:

Admit that Nadia Marcinkova was a customer of JPM.

RESPONSE TO REQUEST FOR ADMISSION NO. 6

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Request No. 6 because it does not specify a relevant time frame.

Subject to and without waiver of the foregoing general and specific objections, JPMC admits Request No. 6.

REQUEST FOR ADMISSION NO. 7:

Admit that Sarah Kellen was a customer of JPM.

RESPONSE TO REQUEST FOR ADMISSION NO. 7

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Request No. 7 because it does not specify a relevant time frame.

Subject to and without waiver of the foregoing general and specific objections, JPMC admits Request No. 7.

REQUEST FOR ADMISSION NO. 8:

Admit that Jeffrey Epstein used JPM to run his sex trafficking operation.

RESPONSE TO REQUEST FOR ADMISSION NO. 8

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Request No. 8 because it improperly calls for a legal conclusion. *Carver*, 2018 WL 4579831, at *2. JPMC also objects to Request No. 8 because it “seek[s] information as to fundamental disagreement at the heart of the lawsuit.” *Republic of Turkey*, 326 F.R.D. at 400. JPMC further objects to Request No. 8 because it does not specify a

JPMC also objects to Request No. 31 as “unreasonably cumulative or duplicative” because it seeks discovery that can be obtained from a “more convenient, less burdensome, or less expensive” source, namely requests for document production. *See* Fed. R. Civ. P. 26, 34. JPMC further objects to Request No. 31 as vague, ambiguous, overly broad, and unduly burdensome because it cannot be answered without drawing factual and legal conclusions about the unproven allegations in the First Amended Complaint. *See* Fed. R. Civ. P. 36(a)(1); *Carver*, 2018 WL 4579831, at *2. JPMC also objects to Request No. 31 because it misuses Requests for Admission as a discovery device. *See Pasternak*, 2011 WL 4552389, at *5; *De Niro*, 2022 WL 101909, at *2. JPMC further objects to Request No. 31 because it is improperly compound and conjunctive. Fed. R. Civ. P. 36(a)(2).

Dated: March 23, 2023

Respectfully submitted,

By: /s/ John J. Butts

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2023, the foregoing document, entitled “JPMorgan Chase Bank, N.A.’s Responses and Objections to Plaintiff’s First Request for Admissions,” was served in accordance with the Federal Rules of Civil Procedure and/or the Local Rules of the United States District Court for the Southern District of New York upon the attorneys for the plaintiff in the above-entitled action by electronic mail.

DATED: March 23, 2023
 New York, NY

By: /s/ Denis Hurley